

IGC COMMUNICATIONS PHONE CARD CO.

4758 RIDGE ROAD., #407
CLEVELAND, OHIO 44144

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Statement of CPNI Procedures and Compliance:

IGC Communications Phone Card Co. ("IGC" or "the Company") operates solely as a prepaid calling card provider which furnishes Personal Identification Numbers ("PINS ") to distributors, who in turn sell the prepaid calling cards to end users. As such, IGC provides casual prepaid calling card services to transient users with whom it does not have a subscriber relationship. Therefore, it does not have any information that relates to the quantity, technical configuration, type, or location of the customer's service and does not even know the customers' billing name and address. Because the service is provided outside of any subscribed service relationship, the Company does not obtain any CPNI that can be used for marketing purposes. Should IGC expand its business in the future to include the provision of services that involve CPNI, it will follow the applicable rules set forth in 47 CFR Subpart LJ.

IGC does have call detail information concerning the calls made using the Company's prepaid calling cards. A prepaid card subscriber can't access call detail via the Company's Integrated Voice Response System. The PIN's are randomly generated and are not associated with readily available biographical information or account information. No call detail information is provided by live customer service representatives, nor is call detail made available to customers online or in person. A PIN holder can not access calling detail associated with that PIN under any circumstances. (The only possible exception being a Court Order.) The Company has processes in place to safeguard the call detail information that it obtains through the use of its prepaid calling cards from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to these records. Call records are maintained on password protected secure servers behind firewalls. Personal Computers (all of which are Company owned) utilize Full Disk Encryption and are password protected.

The Company has procedures in place to notify law enforcement in the event of a breach of call detail records. As the Company does not have any pre-subscribed customers, it cannot notify customers of any such a breach. As soon as practicable, and in no case later than seven business days upon learning of a breach, the company will notify the U.S. Secret Service and the FBI by electronic means, as required by FCC regulations. The Company will maintain electronic records of any breaches that are discovered and of notifications made to the OSS and the FBI for a period of at least two years. Information regarding any breaches and notifications will be maintained by a designated supervisor level employee responsible for managing the company's CPNI compliance.

IGC did not have any breaches during 2011.

IGC has not taken any actions against data brokers in the last year.

The Company did not receive any customer complaints about the unauthorized release or disclosure of call detail records in calendar year 2011.

Due of the nature of its business, IGC does not believe that pretexters would attempt to gain access to the call detail records that it obtains from the provision of prepaid calling card services, because the call details are not tied to pre-subscribed customers. Accordingly, the Company has not developed any information with respect to the processes pretexters may use to attempt to access CPNI.